

On behalf of Pinwheel, Inc., I am submitting these comments in response to the Commission's December 19, 2001 Public Notice in the above-referenced proceeding. In its Public Notice, the Commission requested comment on the Nation Radio System Committee's ("NRSC") recent evaluation of iBiquity Digital Corporation's ("iBiquity") FM IBOC system and the results of iBiquity's FM system tests. These submissions by the NRSC and iBiquity establish a record at the FCC demonstrating the need for digital audio broadcasting and the value of iBiquity's IBOC system will bring to the U.S. listening public. Pinwheel, Inc. encourages the Commission to promptly endorse IBOC and the iBiquity system as the best means of implementing terrestrial digital audio broadcasting in the United States.

Pinwheel, Inc. is an independent owner of KWED-AM in Seguin, Texas. Our station is in a small town 45 miles East of San Antonio, Texas, and targets listeners with local News, Information and Public Affairs programming in addition to our Country music format. Although we do not own an FM station, we feel strongly about the necessity to upgrade the terrestrial broadcasting system in the United States to digital.

We have closely followed the developments concerning IBOC, and we endorse the Commission's commitment to ensure a digital future for terrestrial radio. The NRSC has found that the iBiquity FM IBOC digital system will provide improved quality and either eliminate or drastically reduce problems of FM broadcasting including multipath. The virtual elimination of multipath would be, in itself, a great service to the American listening public, not to mention the increased quality of sound that will result from implementation of this service, without harming existing analog, and allowing an orderly transition to an all-digital system in the future.

For many years terrestrial radio has been on the sidelines as the Commission has developed a digital future for other broadcast and wireless technologies, including the recently launched satellite audio services. The NRSC's validation of the benefits and viability of IBOC provides an opportunity for the Commission to deliver on its promise to ensure a digital future for terrestrial radio. We believe it is important for the Commission to provide a strong endorsement of iBiquity's IBOC digital system in order to encourage its widespread and prompt adoption.

Respectfully Submitted

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